



AIR 03-607

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
DIVISION OF RADIATION PROTECTION  
7171 Cleanwater Lane, Bldg. 5 • P.O. Box 47827 • Olympia, Washington 98504-7827  
TDD Relay 1-800-833-6388

June 20, 2003

Mr. Joel B. Hebdon, Director  
U. S. Department of Energy  
Regulatory Compliance  
and Analysis Division  
P. O. Box 550 MSIN A 5-58  
Richland, Washington 99352

**RECEIVED**  
JUL 29 2003  
**EDMC**

Mr. James E. Rasmussen, Director  
U. S. Department of Energy  
Office of River Protection  
Environmental Management Division  
P. O. Box 450 MSIN H 6-60  
Richland, Washington 99352

## Addressees:

Per WAC 246-247-080 (1), the department is requiring an ALARACT demonstration of the non-standard (not constructed and/or tested to ASME/ANSI AG-1, Code on Nuclear Air and Gas Treatment) HEPA filters used at the Plutonium Finishing Plant. These filters were discussed at various meetings between the department and Department of Energy (DOE) during the months of April and May 2003.

The basis for the ALARACT demonstration requirements are the ALARACT standards given in WAC 246-247-040 and the definition of ALARCT given in WAC 246-247-030. It is the applicant's responsibility to demonstrate the effectiveness of their ALARCT determination to the department. The department may adjust this demonstration procedure on a case-by-case basis, as needed, to ensure compliance with the substantive standard.

This ALARACT demonstration shall contain the following information:

1. A listing of all emission units at the DOE Hanford Facility where these or other non-standard filters are installed.
2. Provide listing for associated Notices of Constructions and Approvals.

**RECEIVED**

JUN 24 2003

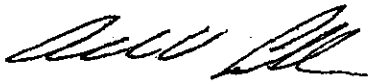
DOE-RL/RLCC

Addressees  
AIR 03-607  
June 20, 2003  
Page 2

3. The individual Potential to-Emit to be associated with each of these identified units.
4. Documentation of the manufacture filter testing that is done to show equivalence to ASME/ANSI AG-1 Section FC.
5. Documentation of the in-place filter testing results and any records from operation indication devices (DP gauges) for the last five years

This ALARACT demonstration shall be completed and submitted to the department for review no later than August 31, 2003.

Sincerely,



Allen W. Conklin, Supervising Health Physicist  
Air Emissions and Defense Waste Section  
Division of Radiation Protection

AWC/JWS/jr

cc: Dennis Bowser, DOE-ORP  
Rick Poeton, EPA  
Stephen Lijek, Ecology  
Oliver Wang, Ecology  
Earl Fordham, WDOH  
Nick Ceto, EPA

Fax: WDOH-Hanford June 20, 2003